1	Sarah E. Piepmeier, Bar No. 227094		
2	SPiepmeier@perkinscoie.com Elise Edlin, Bar No. 293756		
3	EEdlin@perkinscoie.com PERKINS COIE LLP 505 Howard Street, Suite 1000 San Francisco, California 94105 Telephone: +1.415.344.7000		
4			
5			
6	Facsimile: +1.415.344.7050		
7	Additional attorneys listed on signature page.		
8	Attorneys for Defendant		
9) NETFLIX, INC.		
10	UNITED STATES DISTRICT COURT		
11			
12	NORTHERN DISTRICT OF CALIFORNIA		
13	OAKLAND DIVISION		
14			
15	LAURI VALJAKKA,	Case No. 4:22-cv-01490-JST	
16	Plaintiff,	STATUS REPORT ON DISCOVERY	
17	v.	Date: May 8, 2025 Time: 2:00 PM	
18	NETFLIX, INC.,	Place: Virtual Hearing (Zoom)	
19	Defendant.	Judge: Hon. Jon S. Tigar	
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STATUS REPORT ON DISCOVERY

On March 20, 2025, the Court granted the parties' request to extend fact discovery until May 26, 2025. The parties agreed to provide an update on the status of third-party discovery and a proposed schedule in advance of the May 8, 2025 hearing on Netflix's Motion for an Order to Show Cause and Sanctions Against Plaintiff's Former Attorney, William Ramey.

Netflix sought—and the Court granted—an extension so that Netflix could complete its discovery from third-party AiPi, Inc. On April 18, 2025, Judge Brinkema of the Eastern District of Virginia rejected Plaintiff Valjakka's privilege claims and ordered AiPi to produce all allegedly-privileged documents related to Mr. Valjakka's litigation campaign. *AiPi, LLC v. Netflix, Inc.*, No. 1:24-mc-00002-LMB-WEF, ECF No. 96 (E.D. Va.). Then, on April 23, 2025, the forensic discovery agent managing the AiPi discovery (PricewaterhouseCoopers) released over 150,000 documents to Netflix identified via search terms that relate to the subject matter of Netflix's subpoena.

Given the volume, Netflix needs time to review these recently-produced documents prior to taking the remaining depositions (including CDN Licensing and AiPi's Eric Morehouse). Netflix and Plaintiff Valjakka will be prepared to discuss whether remaining discovery can be completed on the current schedule, or if a minor adjustment may be appropriate, if acceptable to the Court, at the May 8 hearing.

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1	Dated: May 5, 2025	Respectfully submitted,
2		/s/ Elise S. Edlin
3		Sarah E. Piepmeier, Bar No. 227094
4		Elise S. Edlin, Bar No. 293756 PERKINS COIE LLP
		505 Howard Street, Suite 1000
5		San Francisco, California 94105
6		SPiepmeier@perkinscoie.com EEdlin@perkinscoie.com
7		Telephone: +1.415.644.7000
		Facsimile: +1.415.344.7050
8		Janice L. Ta (appearance pro hac vice)
9		PERKINS COIE LLP
10		405 Colorado Street, Suite 1700
1.1		Austin, Texas 78701 JTa@perkinscoie.com
11		Telephone: +1.737.256.6100
12		Facsimile: +1.737.256.6300
13		Adam Hester, Bar No. 311206
14		PERKINS COIE LLP
		33 E. Main Street, Ste. 201 Madison, Wisconsin, 53703
15		AHester@perkinscoie.com
16		Telephone: +650.838.4311
17		Rachael D. Lamkin (SBN 246066)
18		Karan Singh Dhadialla (SBN 296313) BAKER BOTTS L.L.P.
19		101 California Street, Suite 3200
20		San Francisco, CA 94111 Telephone: + 1.415. 291.6200
		Facsimile: +1.415.291.6300
21		rachael.lamkin@bakerbotts.com
22		karan.dhadialla@bakerbotts.com
23		Attorneys for Defendant
24		NETFLIX, INC.
25		
26		
27		
28		2
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